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May 2, 2025

VIA ECF

Honorable Rukhsanah L. Singh, U.S.M.J.
United States District Court
District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State St.
Trenton, NJ 08608

Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS
MDL No. 3080

Dear Judge Singh:

We represent Defendants CVS Health Corporation, CVS Pharmacy, Inc., Caremark Rx, LLC, Caremark LLC, and Caremark PCS Health, LLC, and Zinc Health Services, LLC, in the above-captioned litigation. We jointly write on behalf of the PBM Defendants¹, Plaintiffs, and non-party Compass Lexecon LLC to respectfully request an adjustment to the briefing schedule for Plaintiffs' Motion to Compel Responses to Compass Lexecon Subpoena to Produce Documents ("Motion") [ECF No. 522].

On April 25, 2025, Plaintiffs filed their Motion. Both PBM Defendants and Compass Lexecon will file oppositions to Plaintiffs' Motion. Because the Motion is noticed for hearing on May 19, 2025, any opposition papers are currently due on May 5, and any reply due on May 12. The parties and non-party Compass Lexecon respectfully request a brief extension of these deadlines, such that any opposition papers would be due on May 30, and any reply by Plaintiffs would be due on June 13. If this joint request is acceptable, we ask that Your Honor endorse this letter as "So Ordered" and have it entered on the Court's docket.

¹For purposes of this request, "PBM Defendants" refers to CVS Health Corporation, CVS Pharmacy, Inc., Caremark Rx, LLC, Caremark LLC, and Caremark PCS Health, LLC, Zinc Health Services, LLC, Express Scripts, Inc., Evernorth Health, Inc. (formerly known as Express Scripts Holding Company), Express Scripts Administrators, LLC, ESI Mail Pharmacy Services, Inc., Express Scripts Pharmacy, Inc., Medco Health Solutions, Inc., The Cigna Group, Ascent Health Services, LLC and OptumRx, Inc. These entities use the term "PBM Defendants" solely for ease of reference, even though certain of those entities are not pharmacy benefit managers.

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Thank you for your attention to this matter.

Respectfully submitted,

/s John D. Tortorella

John D. Tortorella

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Caremark LLC, and Caremark PCS Health,
LLC*

/s Nicholas C. Suellentrop

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*Counsel for Defendants Caremark Rx, LLC,
Caremark LLC, and Caremark PCS Health,
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cc: Honorable Brian R. Martinotti, U.S.D.J.
All Counsel of Record

SO ORDERED:

Hon. Rukhsanah L. Singh, U.S.M.J.